



OneWorld Communications, Inc.

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VIA ELECTRONIC FILING

The Honorable Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

Comments on "Telecommunications Relay Services Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking (NPRM) FCC 03-112", especially regarding Items 128 – 130.

As solicited by the above-mentioned NPRM, we are providing comment, advice and experience to address concerns about the level of success in educating the public about Telecommunications Relay Services (TRS), as required in the following rules quoted in the NPRM:

"Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible."

We are here responding to the following issues and questions raised in the NPRM:

1. **"... this rule may not be fully effective in ensuring that the public is aware of TRS. We seek comment on the scope of this problem. What is the current rate of hang-ups on TRS calls? How effective are outreach efforts at addressing these issues?"**

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2. **"What type of outreach is most effective for these types of services?"**
3. **"What types of materials are most effective at reaching targeted consumers? What distribution methods are most effective?"**
4. **"Can a national campaign be modeled on a successful state campaign? What should be the role of federal funding in these efforts?"**

We are providing comment and advice by drawing from our experiences in the State of California, in the creation, execution and monitoring of results of public education campaigns to promote both the use of the TRS and 7-1-1, and the related specialized telephone equipment distribution program which provides, among various devices, the TTYs, VCO phones and other devices used by consumers in the TRS. Tens of thousands more people are now taking advantage of these programs due, we believe, to effective outreach (marketing) campaigns. We are OneWorld Communications, a marketing communications, media and public relations firm, specializing in providing public service marketing campaigns to assist government and non-profit organizations to achieve their missions.

In addition to sharing our experience with TRS outreach efforts, we believe that offering information about promoting the California specialized telephone equipment distribution program is useful to readers because:

- the TRS and equipment programs are often closely linked in many states, as they are in California,
- essentially the same marketing principles, embodying a customer-oriented approach, are applicable to both the TRS and equipment programs,
- in California, there is richer data to examine from promoting the equipment program, because more effort and resources have been devoted to promoting it, thus far, and tracking the number of users of the equipment program, who need to be certified as eligible, is easier than tracking users of the relay service, which is open to all, and
- as the proportion of seniors in the general population continues to increase, equipment distribution programs for late deafened adults and other communities may become increasingly important.

(Note. the information contained here can also be seen in visual form from a PowerPoint presentation available at <http://www.owcom.com/FCC/owc.pdf>)

Overview

In California, under the direction of the California Relay Service (CRS) and the California Telephone Access Program, (CTAP), the state's equipment distribution program, we created, executed and monitored the results of a series of marketing communications campaigns to inform and motivate the public, and accelerate the rate at which individuals choose to utilize these services and programs, during 2001 – 2003. We were hired to perform this work by the Deaf and Disabled Telecommunications Program of the California

Public Utilities Commission, the umbrella program which oversaw the TRS and equipment distribution program

To launch the new 7-1-1 access number for the TRS / CRS, in October 2001, on short notice we created and carried out an initial "Dial 7-1-1" communications campaign in October 2001, and then further developed it and spread it more extensively across the state in January 2002.

To promote the sister program, the CTAP specialized telephone equipment distribution program, we conducted the "Amazing Phones" campaign in various markets across the state. The results cited here refer to one of these efforts conducted in the greater Los Angeles area in January 2003, with reference also made to a replication of the same campaign in the rural Fresno area and the San Francisco Bay Area.

1. "... this rule may not be fully effective in ensuring that the public is aware of TRS. What is the current rate of hang-ups on TRS calls? We seek comment on the scope of this problem..... How effective are outreach efforts at addressing these issues?"

and

2. "What type of outreach is most effective for these types of services?"¹

We provide two examples:

After the "Dial 7-1-1" media and public relations campaign, the use of 7-1-1 rose from its inception as a totally new service in California starting October 1, 2001, from zero to 132,000 calls average per month, or rose from 0% to 24% of total relay calls made in California in the following year (Reference: DDTP Annual Report 2002)

¹ A technical comment on terminology "Outreach" is a term we construe the authors of the NPRM 03-112 to describe any and all activities to inform and educate target audiences about services and programs. However, among some circles of professional communicators and marketers, including ourselves, we often use the term "outreach" as a subset of "marketing communications". In our terminology "outreach" describes the activity of persons who individually go into the community and make presentations to inform individuals and groups. On the other hand, "marketing communications" encompasses a larger process and draws on a larger skill set. Marketing communications may involve some or all the following as needed by a particular project: marketing research (e.g. focus groups and surveys) to assist in providing data with which to help create marketing objectives, strategy, and creative messages, branding and identity creation for a product or service, positioning it as distinctly valuable in relation to other options, creation of message materials in the media forms needed according to the strategy and target audiences (including print, broadcast i.e. radio and TV materials, outdoor / transportation advertising, Web), media research and buying, placement of advertising and Public Service Announcements, presentations to and dialogue with small groups, public relations activities including publicity, news events and providing information and ideas to journalists, and monitoring / tracking / interpreting results as part of marketing research and evaluation.

Please see the chart as an attached Exhibit. Also there was qualitative impact, as described below

The "Amazing Phones" media campaign aimed to promote consumer requests for specialized telephone equipment, including TTYs and VCOs which are used by consumers for the TRS. During the Los Angeles area campaign, during three weeks in January 2003, the campaign increased the rate of the New Customer Acquisition process² by 863% over the preexisting baseline, and after the campaign, continued at a rate of two to four times higher than before. For example, instead of the program's Call Center issuing 150 certification (application) forms a day to people who inquired about and in fact required them, they sent out in excess of 1200 certification forms a day. Please see the attached Exhibits, graphs showing the results of these campaigns

Another result of this equipment campaign was the number of people visiting the program's Service Centers, known as "Walk-ins", which increased 400% during the campaign. The Service Centers dispense the equipment, such as TTYs, amplified phones, etc., and provide advice and training to consumers.

Still another result of this equipment campaign was that overall consumer awareness of the program rose net 11%, in a test market (Los Angeles) versus a control market according to a research study conducted by telephone survey.

We believe that the success of these campaigns was not merely a result of performing outreach (marketing communications) per se, but required an effective marketing and message strategy.

The strategy for the TRS campaign is described below, under the next section. The strategy for the "Amazing Phones" campaign specifically was designed to address perceptions among the target audience which we felt impeded their utilization of the program. These impediments included: self-denial that an impairment exists, fear of scams which might be confused with a "free" telephone equipment offer by the State, hesitation about being able to master new technology represented in the telephone equipment, and anticipation of tiresome bureaucratic rules and procedures to benefit from the program. These perceptions were addressed with clear and positive messages that were credible and legitimizing of the program's offer of specialized equipment. As a professional marketing and advertising agency, we utilized a number of creative tactics in text and visuals. They are shown and

² The "New Customer Acquisition" process is a term used here to describe the number of people being sent a certification (application) form by which they may apply to receive specialized telephone equipment. These people were qualified as potentially eligible applicants or otherwise needing a form, representing 62%, or roughly two out of three, of the total number of people contacting the program's Call Center during and after the campaign.

further explained in the above mentioned PowerPoint presentation at <http://www.owcom.com/FCC/owc.pdf>

In summary, these two related "outreach" (marketing communications) campaigns had a measurable positive impact on the rate of people's use, and participation in, the TRS / 7-1-1 and the related specialized telephone equipment distribution program.

A new message strategy for TRS

Measured quantitative data of the rate of "hang-ups" on incoming relay calls, as affected during the time of the above mentioned "Dial 7-1-1" campaign, unfortunately is not available for purpose of these comments

The problem was highly recognized, however, and upon review of possible messages of "don't hang up", we determined that this approach was inadequate to successfully influence the hearing community responsible for hanging up. Consequently we developed a new message strategy to address what we believed to be the underlying cause of hang-ups. After the campaign, recipients of these messages commented very favorably on this strategy, and so we describe it here as a potentially useful approach for others to consider.

The "Dial 7-1-1" message strategy we developed in California addresses what we felt to be a fundamental underlying cause of hang-ups to incoming relay calls: hearing people's lack of knowledge about people who are deaf, including why and how deaf people or very hard of hearing people communicate by telephone.

We based our new message strategy on the belief that it is vital for the hearing community to appreciate that people who are deaf have equivalent needs to use the telephone, that deaf people bring equivalent opportunities to telephone conversations, that they have the same sorts of problems to solve over the telephone, as hearing callers. In short, deaf people have business to conduct, relationships to pursue, information to gather, products and services to sell or buy, etc just as hearing people do ³

³ As an aside, for the California State Personnel Board, we conducted a survey of state hiring managers to understand their attitudes towards people with impairments and disabilities, in order to better market a state disability employment program. One finding of the survey was that hiring managers (the majority of which we assume are non-disabled) were more likely to use the program if they favorably perceived the interviewing/hiring process of interacting with people who have disabilities. From this and other data we construed that if non-disabled hiring managers could feel more comfortable with communicating with potential employees who have disabilities, and have less fear of embarrassing themselves or otherwise imagining themselves in a compromising situation, they might be more prone to invite disabled job candidates to interviews, thereby increasing the potential to hire them. Addressing people's perceptions with useful information could have a huge impact.

We believe that as the hearing community increasingly comes to understand the deaf community, it will more easily absorb and appreciate the means and procedure by which a relay call is conducted, i.e. recognizing an incoming relay call as a legitimate and normal call, not a telemarketing pitch on which to hang-up.

On the other hand, our marketing experience in general warned us that bare bones messages instructing people "don't hang up" would not gain the attention of the hearing community as strongly or persuasively. Instead, it was necessary to include the "benefit factor" (that deaf people have the same things to offer on the phone as hearing people) and a "comfort factor" (that it is easy to communicate by relay, and acceptable since a lot of other people are doing it). Hearing people need to be interested enough to appreciate such messages.

Utilizing this creative approach, we developed a series of newspaper, poster, transportation/outdoor and television advertisements which showed deaf people and hearing people using 7-1-1 to communicate about personal relationships, business, investing and family, i.e. everyday interpersonal communications in family and business situations. They were presented in attention-getting and positive ways. We created bright and colorful print materials with dynamic photos of people using 7-1-1, with headlines which read

- o "How to whisper what you really feel to a boyfriend who is deaf."
- o "How to sing Happy Birthday to Charlie who is deaf."
- o "How to have a chin-wag with an overseas friend who is deaf." (Long distance to Australia)
- o "How to discuss a hot stock with a client who is deaf."
- o "How to take orders for your fabulous widgets from buyers who are deaf "

[Answer]

Dial 7-1-1 Anyone Anywhere. Anytime.

Free new phone service links hearing and deaf callers

Note: examples are available for viewing at <http://www.owcom.com/FCC/owc.pdf>

The strategy of the campaign was to increase the hearing community's familiarity with deaf people and the fact that they need to (and like to) communicate on the telephone with hearing people. The new convenient "7-1-1" access number was used as a perfect opportunity to promote this concept, as fundamental to begin solving the problem of "hang-ups "

As a next step, we can see adding to such a campaign with information about the mechanics of incoming relay calls, if necessary. Marketing research about the need for this information and others would be advisable.

Also, it may be noted that we decided to present 7-1-1 as the relay service itself, not merely a new feature. This simplified the message enormously, allowing a focus on the benefits of relay, not its mechanics, as a better way of attracting new users, and promoting their understanding of the process.

3. What types of materials are most effective at reaching targeted consumers? What distribution methods are most effective?

The Dial 7-1-1 campaign developed in California was principally aimed at the hearing community, not the deaf community. The hearing community of course has many demographic segments, of which businesses, government, non-profit and other public benefit organizations might be considered especially important for communications with people who are deaf.

Faced with a limited budget, recognizing the need to reach a mass audience, a broad demographic of Adults 25 years and older ("25+") was targeted utilizing:

- Newspaper advertisements (series of five themes) in mass circulation mainstream newspapers
- Transportation advertising, i.e. on the sides and interiors of buses, interior of trains, and in bus shelters
- Posters
- Television advertising (Four PSAs, one business oriented, one personal, in English and Spanish)

In addition we developed a media event to further promote "Dial 7-1-1." We arranged for the flamboyant mayor of San Francisco, Willie Brown, to make the first 7-1-1 call in California to Academy Award winning deaf actress Marlee Matlin in Los Angeles. We simultaneously contacted the news media with press releases and phone calls. The event received major coverage on TV, radio and in newspapers. Millions of Californians were exposed to the campaign messages through advertising and journalistic media, with coverage obtained in over a half dozen television news stations, at least a dozen newspapers, and the Associated Press.

Our "Dial 7-1-1" media strategy also involved leveraging the best value for outdoor advertising. We negotiated and obtained in excess of \$1,000,000 of free transportation / outdoor advertising space, only needing to provide the expenses for printing the materials, and labor fees to post the ads, in a statewide campaign.

For the "Amazing Phones" campaign to promote applications for specialized equipment we utilized advertising and public service announcements in mass circulation newspapers and ethnic-oriented publications, radio, transportation advertising, trade show booth / displays, flyers, and now are poised to utilize

television advertising. Some of these materials were created in 10 different language versions to reach various ethnic communities of California.

4. Can a national campaign be modeled on a successful state campaign? What should be the role of federal funding in these efforts?

We believe that a national campaign can be modeled on a successful state campaign.

Message strategies can be adapted or directly utilized in other states or nationally. Of course the visuals, such as the people shown in advertisements should be selected to be useful and recognizable to the chosen audiences, regarding demographics, e.g. age, ethnicity, profession or trade, education, etc.

We believe that, budget permitting, a process of pre-testing and fine-tuning the materials with target audiences, and possibly discovering new themes in the process, would be most valuable and wise.

Our advice is to plan ahead about measuring success, by setting communication objectives which are measurable. In this regard, we believe that it is important to be more sophisticated than only measuring the level (hopefully increased) use of Relay and 7-1-1, and the rate of hang-ups (hopefully decreased). We believe that these indicators are the result of a communication process of creating awareness and knowledge, and changing perceptions and attitudes, among target audiences, particularly the hearing community and segments thereof, such as businesses, government agencies, non-profit and community based organizations, educational institutions, and other segments. Knowing the characteristics of these target audiences before the marketing campaign will guide the creation of messages for these audiences, help set communication objectives, and allow measurement of impact after the marketing campaign. For example, a simple communication objective might be: "raise the awareness and knowledge of (target audience) about the 7-1-1 relay service and how it works". This can be studied both quantitatively, such as through a random sample survey, and qualitatively, through focus groups or in-depth interviews.

A national campaign is likely to be more cost-efficient than individual states campaigns, especially for purposes of mass media advertising and public services announcements. There are a number of economies of scale, including:

- markets which geographically overlap two or more states can be targeted without "wasting" expenditures on another state's territory,
- better discounts can be negotiated with a larger budget
- media which simultaneously reach many markets can be considered, such as

- network or multi-market cable television and radio networks / syndicates
 - national print publications
- Printed materials can be duplicated in greater quantities, allowing a much lower price per unit

One role of federal funding might be to streamline and enhance the creative process by which an effective campaign is designed and executed. If a national effort results from either federal funding or a pooling of state resources, such as an Interstate TRS Fund, we would advise caution regarding decision-making about the use of such funds. We believe that effective message strategies depend greatly upon allowing creative ideas to be explored and executed, even if they initially seem to be "outside the box". If possible, we urge that there be a small executive decision-making body to approve the details of a national campaign, and avoid the "watering down" effect of decision-making by a large committee of say, 40 individual states.

In summary, we believe that effective and professionally produced outreach (marketing communications) campaigns can have a huge positive impact on the use of TRS and the related specialized telephone equipment distribution programs of states. Carrying out some components of the campaign on the national level will be more cost effective. Defining these components would be the logical first step in creating a professional marketing plan and strategy.

If there are any further questions about these matters, readers are invited to contact the signatory below.

Respectfully,

/s/

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President

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Attached: Exhibits I and II.

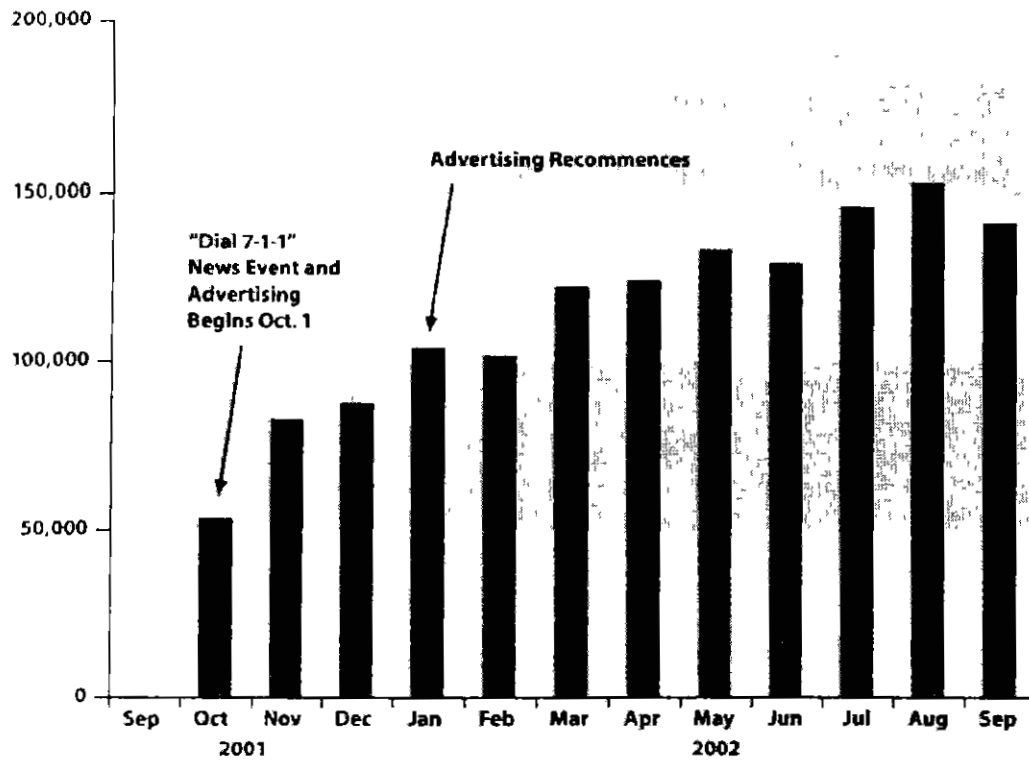
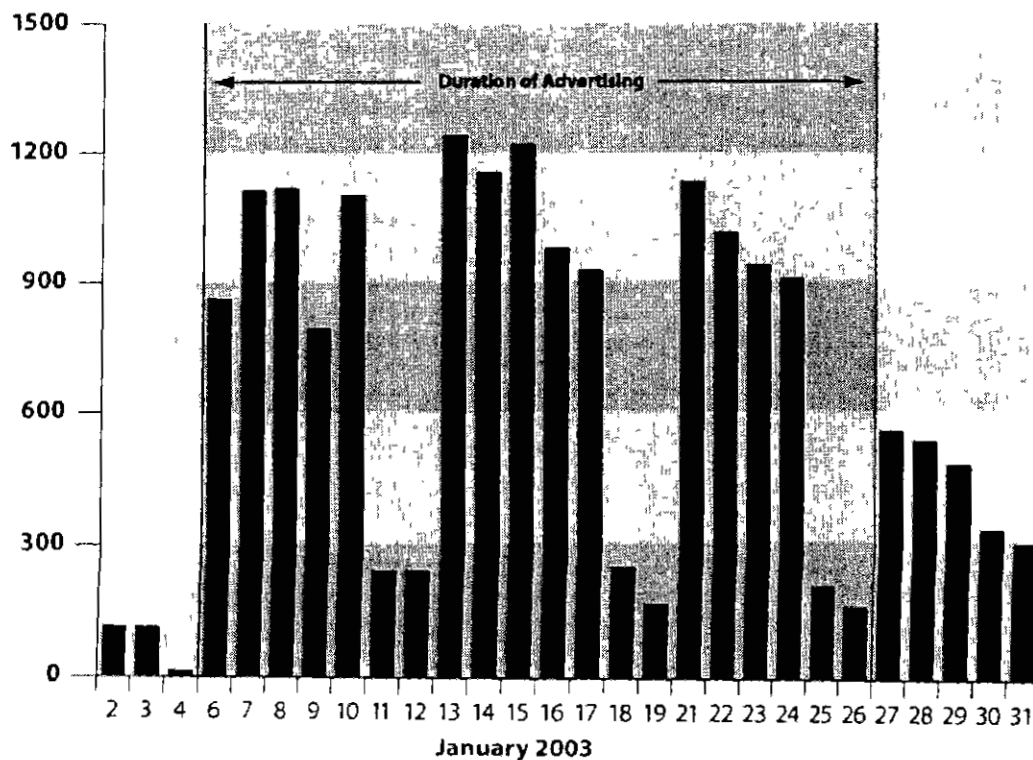
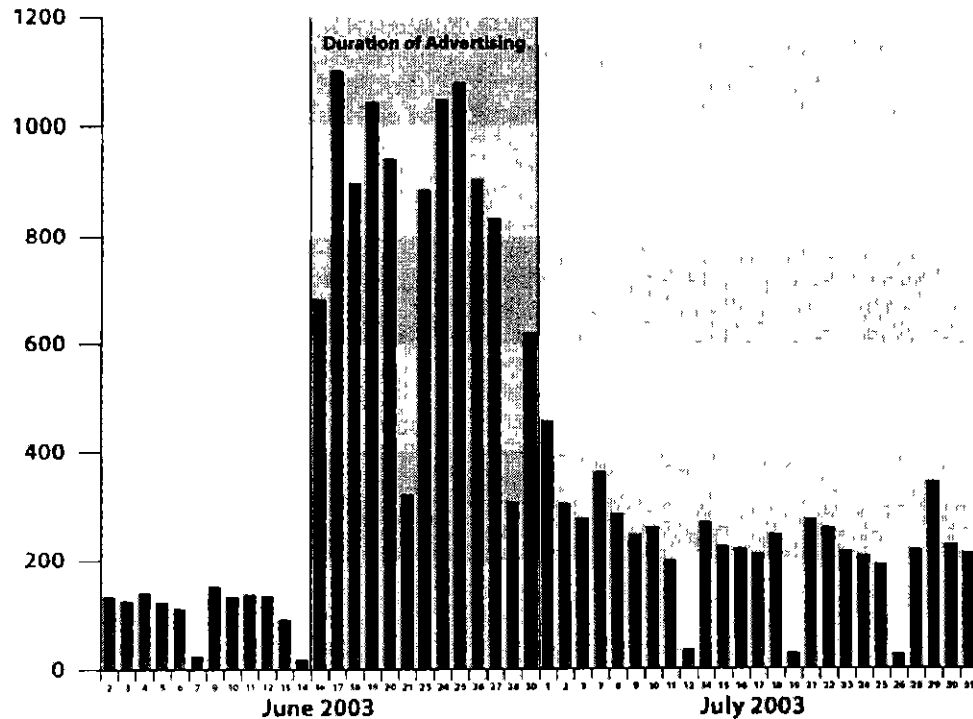
Exhibit 1**Number of Calls in the First Year of California's 7-1-1 Service****CA "Amazing Phones" Campaign Impact**
Certification Forms Issued to Consumers

Exhibit 2

CA "Amazing Phones" Campaign, Replication of Impact Certification Forms Issued to Consumers



CA "Amazing Phones" Campaign Impact Consumer Walk-ins to Fresno Service Center

